

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: **TBD**

Region: Winston-Salem Regional Office
County: Stokes
NC Facility ID: 8500028
Inspector's Name: George Williams
Date of Last Inspection: 12/13/2018
Compliance Code: 3 / Compliance - inspection

<p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): Wieland Copper Products, LLC</p> <p>Facility Address: Wieland Copper Products, LLC 3990 US 311 Hwy. N. Pine Hall, NC 27042</p> <p>SIC: 3351 / Copper Rolling And Drawing NAICS: 331421 / Copper Rolling, Drawing, and Extruding</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p style="text-align: center;">Permit Applicability (this application only)</p> <p>SIP: 02D: .0515, .0516, .0521, .0524, .0614, .1111, .1806</p> <p>NSPS: Subpart IIII NESHAP: Subpart ZZZZ PSD: n/a PSD Avoidance: n/a NC Toxics: n/a 112(r): n/a Other: Removed 02D .0958</p>
---	--

Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	
Tony Sprinkle Environmental Supervisor (336) 445-4526 3990 US 311 Hwy. N. Pine Hall, NC 27042	Walter Maxwell Chief Executive Officer (336) 445-4558 3990 US 311 Hwy. N. Pine Hall, NC 27042	Tony Sprinkle Environmental Supervisor (336) 445-4526 3990 US 311 Hwy. N. Pine Hall, NC 27042	<p>Application Number: 8500028.19A Date Received: 09/11/2019 Application Type: Renewal Application Schedule: TV-Renewal</p> <p style="text-align: center;">Existing Permit Data</p> <p>Existing Permit Number: 02469/T21 Existing Permit Issue Date: 05/26/2015 Existing Permit Expiration Date: 04/30/2020</p>

Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2017	5.70	3.88	34.34	100.92	2.63	0.2192	0.1379 [Hydrogen chloride (hydrochlori)]
2016	6.54	4.90	43.10	110.35	3.19	0.2258	0.1645 [Hydrogen chloride (hydrochlori)]
2015	6.38	5.21	55.31	114.13	2.68	0.1867	0.1473 [Hydrogen chloride (hydrochlori)]
2014	8.49	6.31	38.29	119.63	2.87	0.0543	0.0174 [Hydrogen chloride (hydrochlori)]
2013	6.94	5.21	48.14	101.62	2.49	0.0963	0.0401 [Hydrogen chloride (hydrochlori)]

<p>Review Engineer: Russell Braswell</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 02469/T22 Permit Issue Date: TBD Permit Expiration Date: TBD</p>
---	--

1. Purpose of Application:

Wieland Copper Products, LLC ("WCP", "the facility") currently operates a facility in Stokes County under Title V Air Quality Permit 02469T21. The existing permit is set to expire on April 30, 2020. WCP has submitted this application in order to renew the existing permit as required by 15A NCAC 02Q .0513. Because this application was received at least six months¹ before the expiration date, the existing permit will remain in effect, regardless of expiration date, until this renewal application is processed.

In addition to renewing the permit, WCP has requested that the permit include emission sources previously determined to be exempt per 15A NCAC 02Q .0508(f).

2. Facility Description:

This facility manufactures copper pipe products. Activities at the facility include gas and electric-heated furnaces and activities related to forming extruded copper into various pipe shapes.

3. Application Chronology:

- September 11, 2019 Application received.
- September 27, 2019 An initial draft of permit 02469T22 was sent to DAQ staff (Tom Anderson, Mark Cuilla, George Williams, Lisa Edwards, Samir Parekh) and WCP staff (Tony Sprinkle, Glenn Maxwell). For a summary of comments received, see Attachment 2.
- October 16, 2019 Email sent to Tony Sprinkle regarding potential corrections to the list of permitted sources. Corrections resolved by an email received on October 30, 2019.
- XXX Public / EPA Notice
- XXX Permit issued.

4. Title V Permit Modifications Following the Previous Permit Renewal:

The Title V permit for this facility was previously renewed on May 26, 2015. No modifications have been made to the Title V permit since that renewal.

5. Regulatory Overview:

WCP is subject to the following State Implementation Plan (SIP) and Federal regulations, in addition to the requirements in the General Conditions:

- 15A NCAC 02D .0515 "Particulates from Miscellaneous Industrial Processes"
- 15A NCAC 02D .0516 "Sulfur Dioxide from Combustion Sources"
- 15A NCAC 02D .0521 "Control of Visible Emissions"
- 15A NCAC 02D .0524 "New Source Performance Standards" (40 CFR Part 60 Subpart IIII)
- 15A NCAC 02D .0614 "Compliance Assurance Monitoring"

¹ This deadline is given in 15A NCAC 02Q .0513(b) and was nine months at the time the existing permit was issued. On April 1, 2018, the deadline was lowered to six months.

- 15A NCAC 02D .1111 "Maximum Achievable Control Technology" (40 CFR Part 63 Subpart ZZZZ)
- 15A NCAC 02D .1806 "Control and Prohibition of Odorous Emissions" [State enforceable only]

WCP's requirements under each rule that applies to this facility are discussed below.

6. Rules Review

a. 15A NCAC 02D .0515 "Particulates from Miscellaneous Industrial Processes"

In general, this rule limits particulate emissions from sources with no other specific particulate emission limits. The limit for any individual source is based on the process rate of the source. The only emission sources with substantial particulate emissions at this facility are the furnaces CMF-1, ES-MF-1, ES-MF-2, and ES-CF-1. All other sources at this facility are expected to comply with this rule by default.

Particulate emissions from the furnace CMF-1 are controlled by four bagfilters. The facility demonstrates compliance with this rule by properly operating and maintaining the bagfilters. Records of maintenance and monitoring must be kept and reported twice per year. In addition, this furnace is subject to Compliance Assurance Monitoring ("CAM"). See Section 6.e below for a discussion of this rule.

The remaining furnaces (ES-MF-1, ES-MF-2, and ES-CF-1) do not use control devices to comply with this rule. In order to demonstrate compliance with this rule, the facility keeps records of particulate emissions and process rates such that the particulate emission rate and emission limit can be compared. The facility is not required to report these monitoring activities.

Based on the most recent inspection report, WCP appears to be in compliance with this rule. Continued compliance with this rule will be determined with subsequent inspections and reports.

b. 15A NCAC 02D .0516 "Sulfur Dioxide from Combustion Sources"

This rule limits sulfur dioxide ("SO₂") from fuel burning sources with no other specific SO₂ emission limits. This rule applies to each fuel burning source at this facility.

The only fuels burned at this facility are natural gas and No. 2 fuel oil. According to the emission factors published by the US EPA in AP-42, these fuels are expected to comply with this rule by default. No monitoring, recordkeeping, or reporting is required to demonstrate compliance with this rule.

c. 15A NCAC 02D .0521 "Control of Visible Emissions"

This rule limits visible emissions ("VE") from emission sources with no other specific VE emission limit. The emission limit is either 20% or 40%, depending on the construction date of the specific emission source.

In general, WCP demonstrates compliance by observing emission points for VE above normal on a monthly basis. The facility must keep records of the observations and report them twice per year.

Based on the most recent inspection report, WCP appears to be in compliance with this rule. Continued compliance with this rule will be determined with subsequent inspections and reports.

d. 15A NCAC 02D .0524 "New Source Performance Standards"

This rule incorporates the requirements of 40 CFR Part 60 (a.k.a. "NSPS") into North Carolina's State Implementation Plan ("SIP"). The facility must comply with all NSPS rules that apply to the facility. The only NSPS that applies to this facility is Subpart IIII "Stationary Compression Ignition Internal Combustion Engines". This rule applies to engines constructed after April 2006. Only the generator ES-EG-2 is subject to this rule.

The requirements of Subpart IIII depend on the type of engine. For the purposes of this rule, ES-EG-2 is an emergency-use engine. In general, this rule requires such engines to:

- be certified to the emission standards in 40 CFR 60.4202,
- burn ultra-low sulfur fuel,
- operate per manufacturer's specifications,
- and have a non-resettable hour meter.

Emergency-use engines can be operated periodically for non-emergency purposes as allowed by 40 CFR 60.4211(f). The facility must keep records of time when the engine is operating for non-emergency purposes. The facility must submit reports twice per year.

Based on the most recent inspection report, WCP appears to be in compliance with this rule. Continued compliance with this rule will be determined with subsequent inspections and reports.

e. 15A NCAC 02D .0614 "Compliance Assurance Monitoring"

This rule incorporates the requirements of 40 CFR Part 64 (a.k.a. "CAM") into North Carolina's SIP. CAM applies to individual emission sources based on the following criteria:

- The source is equipped with a control device,
- The source being controlled is subject to a non-exempt emission standard (defined by 02D .0614(b)(1)),
- The control device is being used to comply with the emission standard, and
- The source being controlled has potential emissions of the pollutant subject to the emission standard greater than major source thresholds.

The only emission source at this facility that meet all of the above requirements is the electric arc furnace CMF-1 and the four associated bagfilters.

In order to comply with this rule, CMF must ensure the pressure drop across the bagfilters remains between 0.5 and 5 inches of water. Pressure drop readings must be taken at least once per day and correct any excursions as soon as practicable. Records of the monitoring activities must be kept and reported twice per year.

Based on the most recent inspection report, WCP appears to be in compliance with this rule. Continued compliance with this rule will be determined with subsequent inspections and reports.

f. 15A NCAC 02D .1111 "Maximum Achievable Control Technology"

This rule incorporates the requirements of 40 CFR Part 63 (a.k.a. "MACT") into North Carolina's SIP. This facility must comply with all MACT rules that apply to the facility. The only MACT that applies to

this facility is Subpart ZZZZ "Stationary Reciprocating Internal Combustion Engines". Both generators at this facility are subject to this rule.

This facility is classified as an area source under the MACT rules. Rules that apply only to major sources do not apply to this facility.

The requirements of Subpart ZZZZ depend on the type of engine. For the purposes of this rule, IES-EG-1 is considered an existing emergency-use engine and ES-EG-2 is considered a new emergency-use engine. Both are located at an area source.

For IES-EG-1, this rule requires that the facility operate with good work practice standards and install a non-resettable hour meter. Note that IES-EG-1 is an insignificant source, and that rules that apply specifically to this source will not appear in the Title V permit.

For ES-EG-2, this rule only requires that the engine also comply with NSPS Subpart IIII.

Based on the most recent inspection report, WCP appears to be in compliance with this rule. Continued compliance with this rule will be determined with subsequent inspections and reports.

g. 15A NCAC 02D .1806 "Control and Prohibition of Odorous Emissions"
(State-enforceable only)

This rule requires that WCP not operate the facility in such a way that contributes to odor complaints outside of the facility's boundary.

This rule has no specific compliance requirements. Based on the most recent inspection report, WCP appears to be in compliance with this rule. Continued compliance will be determined during subsequent inspections.

h. Nonapplicable rules

1. 15A NCAC 02D .0900 "Volatile Organic Compounds"

These rules apply to sources that are located in areas that are currently or formerly considered nonattainment areas for ozone. Stokes County is not one such area. Therefore, these rules do not apply to this facility.

The existing permit contains a specific condition for 02D .0958 "Work Practices for Sources of Volatile Organic Compounds". Given that this rule does not apply to this facility, references to this rule have been removed from the permit.

2. 15A NCAC 02D .0530 "Prevention of Significant Deterioration" ("PSD")

This facility is considered a minor source for the purposes of PSD applicability. Therefore, this rule does not apply to this facility

3. 15A NCAC 02D .2100 "Risk Management Program" (a.k.a. "Section 112(r) of the Clean Air Act)

This facility does not appear to store any material listed in 40 CFR 68.130 above its respective threshold. Therefore, this rule does not apply to this facility. In addition, this facility does not have any increased requirements under Section 112(r) of the Clean Air Act.

4. *15A NCAC 02D .1100 "Control of Toxic Air Pollutants" and
15A NCAC 02Q .0711 "Emission Rates Requiring a Permit" [both state enforceable only]*

This facility has not been required to perform air dispersion modeling to demonstrate compliance with toxic air pollutant ("TAP") acceptable ambient limits. In addition, this facility has not been required to demonstrate compliance with any of the TAP permissible emission rates listed in 02Q .0711. Therefore, these rules do not apply to this facility.

This permit renewal does not trigger a review of TAP emission rates.

7. Facility Emissions Review

Since the previous permit renewal, WCP has added several sources that qualify as insignificant and also removed some permitted sources. Based on the three applicability determinations (Request nos. 2786, 3154, and 3461) and information from the most recent emission inventory, the result of the above changes is a reduction of potential VOC emissions by 3.66 tons per year.

See the first page of this review for a summary of actual emissions reported by this facility.

8. Other Regulatory Concerns

- No Notices of Violation or of Recommendation to Enforce have been issued to this facility since the previous Title V permit renewal.
- The facility was most recently inspected by NC DAQ on December 13, 2018 by George Williams. WCP appeared to be in compliance with the Title V permit at the time of that inspection.
- A zoning consistency determination was not required for this permit renewal.
- A Professional Engineer's seal was not required for this permit renewal.

9. Public Notice and EPA Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above. Virginia is an affected State, and Forsyth County is an affected local program.

The Public Notice and EPA Review periods began on XXXXXXXXXX

10. Recommendations

TBD

Attachment 1 to Review of application 8500028.19A
Wieland Copper Products, LLC

Table of Changes to Air Quality Permit No. 02469T22

Insert list from final permit

DRAFT

Attachment 2 to Review of application 8500028.19A
Wieland Copper Products, LLC

Comments Received on Initial Draft of Air Quality Permit No. 02469T22

- Mark Cuilla, by email on October 31, 2019

The email pointed out typos in the draft permit and application review.

Response: The indicated issues have been fixed.

- Jim Hafner, by email on October 3, 2019

The equipment lists in the draft permit should be updated. Several sources have been added and removed from the facility since the previous permit was issued.

Response: I made corrections to the equipment lists based on the email. I sent a corrected list to Tony Sprinkle (Environmental Supervisor for Wieland), and he approved the list on October 30, 2019.

- Davis Murphy, by email on October 3, 2019

The annealing ovens (AF-1 and AF-2) may qualify for exemption.

Response: The applicant has not requested they be moved to the list of insignificant activities. I don't see a reason to make any changes if the applicant has not requested it.